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6 *Attorneys for Defendant*  
*Bellagio, LLC*

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 JORGE ROSALES,

12 Plaintiff,

13 vs.

14 BELLAGIO, LLC, a Nevada corporation;  
ROE Business Organizations I-X; and DOE  
15 INDIVIDUALS I-X, inclusive,

16 Defendants.

Case No. 2:17-cv-03117-JCM-GWF

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR  
DEFENDANT TO FILE ITS REPLY IN  
SUPPORT OF ITS MOTION FOR  
SUMMARY JUDGEMENT  
[FIRST REQUEST]**

17 Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, all parties hereby stipulate to extend the  
18 time for Defendant to file its Reply in Support of its Motion for Summary Judgment (ECF No. 20).  
19 This is the parties' first requires to extend this deadline. This request is sought in good faith and not  
20 for purposes of undue delay.  
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22 **I. RELEVANT FACTS**

23 Discovery in this matter closed September 21, 2018 after two previous extensions were  
24 requested and granted due to the scheduling of depositions and the parties not having transcripts  
25 necessary to proceed with preparing dispositive motions. ECF Nos. 17 and 19. Defendant timely  
26 filed its Motion for Summary Judgment on October 22, 2018 (ECF No. 20), with Plaintiff's  
27 response due November 12, 2018. The parties agreed to a two-week extension for Plaintiff to  
28

1 respond to the Motion for Summary Judgment, which the Court granted, setting Plaintiff's deadline  
2 for November 26, 2018. ECF No. 22. Plaintiff timely filed its response on November 26, 2018.  
3 ECF No. 23. Defendant now seeks a similar two-week extension of time to file its reply.

## 4 **II. REASON FOR REQUEST**

5 The extension is necessary because of Defense counsels' extremely heavy workload across  
6 multiple courts during the month of December. This includes, but it not limited to, dispositive  
7 motion briefing in another case pending before this Court, multiple mediations and an early neutral  
8 evaluation session, including briefing, in the United States District Court for the District of Nevada  
9 in Reno, Nevada, and class decertification briefing in the United States District Court for the  
10 Western District of Missouri. This does not include Defense counsel conducting their normal course  
11 of business including witness interviews, written discovery, and depositions in litigation pending  
12 in various state and federal courts, including travel.  
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14 Therefore, the parties agree that an extension of time is appropriate and stipulate that  
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1 Defendant shall have up to and including December 28, 2018, to file its reply in support of its  
2 motion for summary judgment.

3 Dated this 30th day of November, 2018.

4  
5 KEMP & KEMP

JACKSON LEWIS P.C.

6  
7 /s/ Victoria L. Neal

8 James P. Kemp Bar, No. 6375  
9 Victoria L. Neal, Bar No. 13382  
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/s/ Phillip C. Thompson

Deverie J. Christensen, Bar No. 6596  
Phillip C. Thompson, Bar No. 12114  
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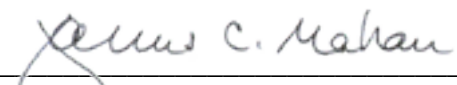
10 *Attorneys for Plaintiff*  
11 *Jorge Rosales*

*Attorneys for Defendant*  
*Bellagio, LLC*

12  
13 **ORDER**

14 **IT IS SO ORDERED:**

15 Dated: December 4, 2018  
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18 UNITED STATES DISTRICT COURT  
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